



Iowa
Telecommunications
Association

*Notice of Ex Parte
Presentation*

May 24, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, Universal Service Reform – Mobility Fund, WT Docket No. 10-208

Dear Ms. Dortch:

On May 23, 2012, representatives of the Iowa Telecommunications Association (Mark Peterson, WTC Communications; Don Jennings, Partner Communications; Butch Rebman, Central Scott Telephone; Doug Boone, Premier Communications; Joe Hrdlicka and I from ITA – all referred to as the “ITA Delegation”) met with Angela Kronenberg, Wireline Legal Advisor for Commissioner Mignon Clyburn. The purpose of this meeting was to discuss matters relating to further intercarrier compensation reform and implementation of those reforms already adopted in the Order released on November 18, 2011 by the Commission in the above-referenced proceedings (“the Order”).

ICC and USF reform measures adopted in the Order and the FNPRM create too much uncertainty to support future investment in network upgrades. The ITA Delegation included two representatives with average schedule companies and two with cost companies, and each discussed the fact that their companies have delayed or halted plans to upgrade broadband networks to their customers. The average schedule company representatives stated that despite the passage of six months since the release of the FCC’s Order, there is insufficient information currently available to assess the impact of the regression analysis on their companies, and that they had not yet received sufficient information to determine the level of ARC charges their companies are eligible to charge. The cost company representatives stated that the recent Third Order on Reconsideration provided some relief on the projected impact of the regression analysis. The entire ITA Delegation stated that they are unable to predict whether future regression analysis caps after 2014 would cause reductions in support, and their inability to develop any build-out plans for broadband deployment based on these uncertainties. The ITA delegation discussed the need for the

Commission to address the harsh impact that selected RLECs will experience from the elimination of the Safety Net Additive for investments that were made in 2010 and 2011.

Waiver Process. In addition, the ITA Delegation urged the Commission to develop a reasonable waiver process, and one that takes into account not only if consumers would lose voice telephone service as an absolute matter (which is what the current standard requires).

Call Completion. The ITA Delegation stated that the ongoing problems relating to “call completion” to rural customers have not abated since the FCC’s Declaratory Ruling in February, and urged the FCC to take strong action to address the problem.

Consistent with the Commission’s rules, this letter is being filed electronically with your office in the above captioned dockets. Please feel free to contact me if you have any questions.

Sincerely,

David C. Duncan
President, Iowa Telecommunications Association

cc: Angela Kronenberg